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July 2, 2012

Honorable Patty Shwartz, U.S.M.J.
United States District Court
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101-0999

Re: Natalie A. Williams, et al. vs. Pressler and Pressler, LLP
Case 2:11-cv-07296-KSH-PS

Dear Judge Shwartz,

I enclose the remaining discovery disputes with respect to Defendant's responses to Plaintiff's Interrogatories and Requests for Production of Documents. Mr. Williamson and I met at his office on Friday afternoon, June 29, 2012 reviewing Defendant's responses and objections. Mr. Williamson emailed me Defendant's replies last evening.

The disputes concerning four subject matters:

1. the creation and procedures for use of the form letter which address, among other things, whether Defendant's conduct was intentional – a factor relevant to the quantum of statutory damages. [Interrogatories 10 and 11; Production Request 9.]
2. Defendant's net worth. [Interrogatories 12, 13 and 18; Production Requests 14 and 15.]
3. The number of collection complaints processed by Ralph Gulko, Esq. [Interrogatories 21, 22, 23 and 24.]
4. A copy of Defendant's file. [Production Requests 8 and 16.]

Respectfully,
s/Philip D. Stern

Philip D. Stern

enclosure

via fax (973) 645-6478 call first

cc: Mitchell L. Williamson, Esq. via email mwilliamson@pressler-pressler.com